

EXHIBIT “A”

IN THE COURT OF COMMON PLEAS
WARREN COUNTY, OHIO

Date: April 14, 2022

Case No: **22CV095012**

WILLIAM P. CAMPBELL
6105 PARKLAND BOULEVARD
MAYFIELD HEIGHTS, OH 44124

BLAKE ANDERSEN
Plaintiff

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.
Defendants

NOTICE OF FAILURE OF SERVICE

To: WILLIAM P. CAMPBELL
(Attorney of Record or Party of Instance)

You are hereby notified of the failure of service upon:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
C/O OWNER
3024 BRECKSVILLE ROAD
RICHFIELD, OH 44286

By Certified Mail pursuant to Rule 4 through Rule 4.6 of Ohio Rules of Civil Procedure.

REASON FOR RETURN:
NOT DELIVERABLE AS ADDRESSED

JAMES L. SPAETH, Clerk of Courts
500 Justice Drive - P.O. Box 238
Lebanon, Ohio 45036

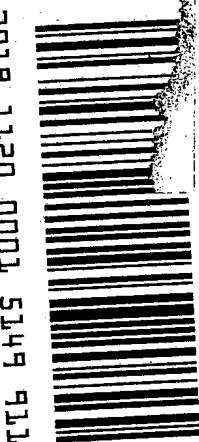


By: Deputy Clerk

CLERK OF COURTS, WARREN COUNTY
P.O. BOX 238, LEBANON, OHIO 45036



JAMES L. SPAETH



ZIP 45036
02 4W
000365678

7019 1120 0001 5149 9118

RETURN RECEIPT REQUESTED

22CV095012
3/24/22
RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC.
C/O OWNER
3024 BRECKSVILLE ROAD
RICHFIELD, OH 44286

NIXIE 482 DE 1 0004/09/22

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 45036023838 0080N099064-06523
00000000000000000000000000000000

CONTENTS REMOVED

JS 4/14/22

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

22CV095012
 WILLIE BURNS JR
 4012 91ST AVENUE
 SPRINGDALE, MD 20774



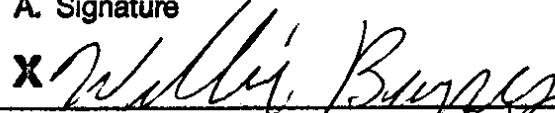
9590 9402 6920 1104 0438 13

(Transfer from service label)

2019 1120 0001 5149 9132

COMPLETE THIS SECTION ON DELIVERY

A. Signature



 Agent Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

 Yes

or delivery address below:

 No

3/24/22

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Mail Restricted Delivery
()

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

22CV095012
 RUAN TRANSPORTATION MANAGEMENT SYSTEMS
 INC
 C/O OWNER 3200 RUAN CENTER
 666 GRAND AVENUE
 DES MOINES, IA 50309



9590 9402 6920 1104 0437 83

2. Article Number (Transfer from service label)

7019 1120 0001 5149 9101

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

S. Hunt (curred)
 S. Hunt (curred-19)

Agent

Addressee

B. Received by (Printed Name)

S. Stone

C. Date of Delivery

3/28/22

D. Is delivery address different from item 1?

Yes

Enter delivery address below:

No

3/24/22

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

ail

ail Restricted Delivery

0)

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 6 of 34 PAGEID #: 11

22CV095012

3/24/22

WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 7 of 34 PAGEID #: 12

22CV095012

3/24/22

WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 8 of 34 PAGEID #: 113

22CV095012

3/24/22

WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774

Filed in Warren County Common Pleas Court on: 03
Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 9 of 34 PAGEID #: 14

22CV095012

3/24/22

RUAN TRANSPORTATION INC

C/O OWNER 3200 RUAN CENTER

666 GRAND AVENUE

DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 10 of 34 PAGEID #: 15

22CV095012

3/24/22

RUAN TRANSPORTATION INC

C/O OWNER 3200 RUAN CENTER

666 GRAND AVENUE

DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 11 of 34 PAGEID #: 16

22CV095012

3/24/22

RUAN TRANSPORTATION INC

C/O OWNER 3200 RUAN CENTER

666 GRAND AVENUE

DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03
Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 12 of 34 PAGEID #: 17

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER 3200 RUAN CENTER
666 GRAND AVENUE
DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 13 of 34 PAGEID #: 18

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER 3200 RUAN CENTER
666 GRAND AVENUE
DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 14 of 34 PAGEID #: 19

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER 3200 RUAN CENTER
666 GRAND AVENUE
DES MOINES, IA 50309

Filed in Warren County Common Pleas Court on: 03
Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 15 of 34 PAGEID #: 20

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS

INC

C/O OWNER

3024 BRECKSVILLE ROAD

RICHFIELD, OH 44286

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 16 of 34 PAGEID #: 21

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER
3024 BRECKSVILLE ROAD
RICHFIELD, OH 44286

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 17 of 34 PAGEID #: 22

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER

3024 BRECKSVILLE ROAD
RICHFIELD, OH 44286

Filed in Warren County Common Pleas Court on: 03
Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 18 of 34 PAGEID #: 23

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER

1905 CLARKSON WAY
LANDOVER, MD 20785-3221

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 19 of 34 PAGEID #: 24

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER

1905 CLARKSON WAY
LANDOVER, MD 20785-3221

Filed in Warren County Common Pleas Court on: 03

Case: 1:22-cv-00221-DRC Doc #: 1-1 Filed: 04/25/22 Page: 20 of 34 PAGEID #: 25

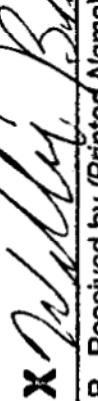
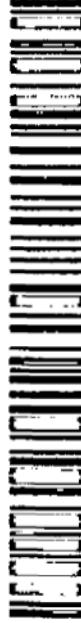
22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS
INC

C/O OWNER

1905 CLARKSON WAY
LANDOVER, MD 20785-3221

SENDER COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY															
<p><input type="checkbox"/> Complete items 1, 2, and 3.</p> <p><input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.</p> <p><input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p>																	
<p><input type="checkbox"/> Signature </p> <p><input type="checkbox"/> Received by (Printed Name)</p>		<p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Date of Delivery</p>															
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>		<p>3/24/22</p>															
<p>22CV095012 WILLIE BURNS JR 4012 91ST AVENUE SPRINGDALE, MD 20774</p>																	
<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Standard Mail</td> </tr> <tr> <td><input type="checkbox"/> Mail Restricted Delivery</td> <td></td> </tr> </table>				<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Standard Mail	<input type="checkbox"/> Mail Restricted Delivery	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Standard Mail																
<input type="checkbox"/> Mail Restricted Delivery																	
<p> 9590 9402 6920 1104 0438 13 7019 1120 0001 5149 9132</p>																	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>																	
<p>Domestic Return Receipt</p>																	

SENDER COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Complete items 1, 2, and 3.</p> <p>2. Print your name and address on the reverse so that we can return the card to you.</p> <p>3. Attach this card to the back of the mailpiece, or on the front if space permits.</p>			
<p>1. Article Addressed to:</p> <p>22CV095012</p> <p>RUAN TRANSPORTATION MANAGEMENT SYSTEMS</p> <p>INC</p> <p>C/O OWNER 3200 RUAN CENTER</p> <p>666 GRAND AVENUE</p> <p>DES MOINES, IA 50309</p>		<p>A. Signature <i>Scout Scout (crown)</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>S. Scoville</i></p> <p>C. Date of Delivery <i>3-28-22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>3/24/22</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Restricted Delivery</p> <p><input type="checkbox"/> Mail Restricted Delivery <input type="checkbox"/> Domestic Return Receipt</p>			
<p>2. Article Number (Transfer from service label)</p> <p>7019 1120 0001 5149 9101</p>			

PS Form 3811, July 2020 PSN 7530-02-000-9053

SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
LEBANON, OHIO 45036

CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

WILLIE BURNS JR
4012 91ST AVENUE
SPRINGDALE, MD 20774

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

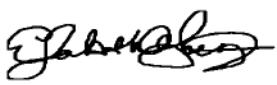
You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

Failure to appear and present a defense to this complaint will result in a judgment by default being rendered against you for the relief demanded in the complaint.

The address of his/her attorney is:

WILLIAM P. CAMPBELL, ATTORNEY AT LAW
6105 PARKLAND BOULEVARD
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts
500 Justice Drive - P.O. Box 238
Lebanon, Ohio 45036

By: 

ELIZABETH LEISZ, DEPUTY CLERK
March 24, 2022

IF THE ABOVE NAMED DEFENDANT IS A CORPORATION PLEASE REFER TO OHIO REVISED
CODE 4705.01.

SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
LEBANON, OHIO 45036

CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
C/O OWNER 3200 RUAN CENTER
666 GRAND AVENUE
DES MOINES, IA 50309

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

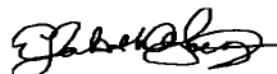
You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

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SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
LEBANON, OHIO 45036

CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
C/O OWNER
1905 CLARKSON WAY
LANDOVER, MD 20785-3221

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

Failure to appear and present a defense to this complaint will result in a judgment by default being rendered against you for the relief demanded in the complaint.

The address of his/her attorney is:

WILLIAM P. CAMPBELL, ATTORNEY AT LAW
6105 PARKLAND BOULEVARD
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts
500 Justice Drive - P.O. Box 238
Lebanon, Ohio 45036

By: 

ELIZABETH LEISZ, DEPUTY CLERK
March 24, 2022

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CODE 4705.01.

SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
LEBANON, OHIO 45036

CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
C/O OWNER
3024 BRECKSVILLE ROAD
RICHFIELD, OH 44286

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

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MAYFIELD HEIGHTS, OH 44124

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SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
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CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
C/O OWNER 3200 RUAN CENTER
666 GRAND AVENUE
DES MOINES, IA 50309

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

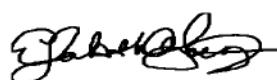
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The address of his/her attorney is:

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6105 PARKLAND BOULEVARD
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts
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By:


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March 24, 2022

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WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
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BLAKE ANDERSEN

VS

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RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC
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DES MOINES, IA 50309

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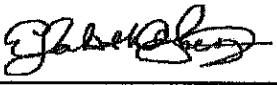
You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

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6105 PARKLAND BOULEVARD
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts
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By: 
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March 24, 2022

IF THE ABOVE NAMED DEFENDANT IS A CORPORATION PLEASE REFER TO OHIO REVISED
CODE 4705.01.

COMMON PLEAS COURT
WARREN COUNTY, OHIO
FILED

2022 MAR 24 AM 10:10

JAMES L. SPAETH
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS
WARREN COUNTY, OHIO

BLAKE ANDERSEN
5620 Maple Street
Kings Mills, OH 45034

Plaintiff

vs.

RUAN TRANSPORTATION MANAGEMENT
SYSTEMS, INC.
c/o Owner
3200 Ruan Center
666 Grand Avenue
Des Moines, IA 50309

and

RUAN TRANSPORTATION MANAGEMENT
SYSTEMS, INC.
c/o Owner
3024 Brecksville Road
Richfield, OH 44286

and

RUAN TRANSPORTATION MANAGEMENT
SYSTEMS, INC.
c/o Owner
1905 Clarkson Way
Landover, MD 20785-3221

and

) CASE NO.: *22CV95012*
)
) JUDGE: **JUDGE TEPE**

) COMPLAINT
)
) (Jury Demand Endorsed Hereon)

RUAN TRANSPORTATION, INC.)
c/o Owner)
3200 Ruan Center)
666 Grand Avenue)
Des Moines, IA 50309)
)
and)
)
WILLIE BURNS, JR.)
4012 91st Avenue)
Springdale, MD 20774)
)
and)
)
JOHN DOE 1-10)
(Names and addresses unknown.))
(Defendants JOHN DOE 1-10 are intended)
to be any and all individuals and/or entities)
who are liable to the Plaintiff for the)
injuries and damages caused by the subject)
collision, including, but not limited to, any)
and all uninsured motorist insurance)
carriers and/or any individual and/or entity)
whose negligence and/or recklessness)
directly and proximately caused the subject)
collision. Despite a good faith effort being)
made by the Plaintiff and his attorneys, the)
names and addresses of Defendants JOHN)
DOE 1-10 could not be ascertained prior)
to the filing of Plaintiff's Complaint.))
)
Defendants.)

Now comes Plaintiff BLAKE ANDERSEN, by and through his attorney, William P. Campbell
of the law firm of Elk and Elk Co., Ltd., and for his complaint, states as follows:

COUNT I

1. On or about April 5, 2020, on a public roadway called Mason Montgomery Road,
in Deerfield Township, Ohio, in Warren County, Defendant WILLIE BURNS, JR. negligently

and/or recklessly operated a motor vehicle into collision with the bicycle being operated by Plaintiff BLAKE ANDERSEN and permanently injuring Plaintiff BLAKE ANDERSEN.

2. Defendants JOHN DOE 1-10 (names and addresses unknown) are intended to be any and all individuals and/or entities who are liable to the Plaintiff for the injuries and damages caused by the subject collision, including, but not limited to, any and all uninsured motorist insurance carriers and/or any individual and/or entity whose negligence and/or recklessness directly and proximately caused the subject collision. Despite a good faith effort being made by the Plaintiff and his attorneys, the names and addresses of Defendants JOHN DOE 1-10 could not be ascertained prior to the filing of Plaintiff's Complaint.

3. At all times herein, Defendant WILLIE BURNS, JR. was operating said vehicle within the course and scope of his employment with Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC.

4. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is vicariously liable for the negligence and/or recklessness of its employee and/or agent and/or representative Defendant WILLIE BURNS, JR.

5. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is liable for the conduct of Defendant WILLIE BURNS, JR., as described herein, based on the Doctrine of Respondeat Superior.

6. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is liable for the negligence and/or recklessness of Defendant WILLIE BURNS, JR. based on Defendant WILLIE BURNS, JR. being a

representative and/or agent and/or employee and/or driver of Defendant RUAN
TRANSPORTATION MANAGEMENT SYSTEMS, INC.

7. The negligence and/or recklessness of all of the Defendants has combined to cause Plaintiff BLAKE ANDERSEN indivisible harm.
8. As a direct and proximate result of the negligence and/or recklessness of the Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN suffered serious and permanent injuries which caused pain, physical and mental suffering, disability and permanent damage.
9. As a direct and proximate result of the negligence and/or recklessness of the Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN needed medical care and treatment and will, in all likelihood, need additional medical care and treatment in the indefinite future.
10. As a direct and proximate result of the negligence and/or recklessness of the Defendant, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN has incurred medical and hospital expenses and will, in all likelihood, incur further such expenses in the indefinite future.
11. As a direct and proximate result of the negligence and/or recklessness of the Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN has lost time and earnings from his employment and will, in all likelihood, lose further time and earnings in the indefinite future. Plaintiff BLAKE ANDERSEN's future earning capacity has been permanently impaired.

THEREFORE: Plaintiff BLAKE ANDERSEN demands damages against Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. and/or Defendant WILLIE BURNS, JR. and/or Defendants JOHN DOE 1-10 (names and addresses unknown), jointly and/or severally and/or concurrently, in an amount, in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), which will fully, fairly and justly compensate Plaintiff BLAKE ANDERSEN for his injuries, damages and costs.

WHEREFORE: Plaintiff BLAKE ANDERSEN demands damages against the Defendants as follows:

On Count I of Plaintiff's Complaint, for a judgment against Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. and/or Defendant WILLIE BURNS, JR. and/or Defendants JOHN DOE 1-10 (names and addresses unknown), jointly and/or severally and/or concurrently, and in favor of Plaintiff BLAKE ANDERSEN, in an amount, in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), which will fully, fairly and justly compensate Plaintiff BLAKE ANDERSEN for his injuries, damages and costs;

Interest at the rate of 10% per annum; and

The costs of the within action; and

Any other further relief to which this Court determines Plaintiff is entitled at law or in equity.

JURY DEMAND

Pursuant to Rule 38(B) of the Ohio Rules of Civil Procedure, Plaintiff hereby demands trial by the maximum number of jurors allowed by law.

Respectfully Submitted,
ELK AND ELK CO., LTD.

By:


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